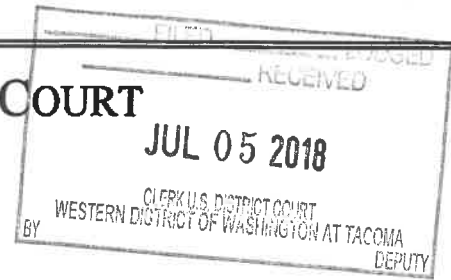


AO 106 (Rev. 04/10) Application for a Search Warrant

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)Austin Haskins; 3411 Bridgeport Way W., Apt. 9,
University Place, WA; 1996 Toyota Camry (WA Reg.
BCM3156); PO BOX 12000, Olympia, WA

Case No.

MJ18-5171

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated herein.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

21 U.S.C. §§ 841, 843, 846
18 U.S.C. § 1956

Distribution/PWID; use of communication facility; conspiracy; money laundering

The application is based on these facts:

See attached affidavit.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Justin Jones, SA, HSI

Printed name and title

Sworn to before me pursuant to Crim. Rule 4.1.

Date: July 5, 2018

Judge's signature

City and state: Tacoma, Washington

Theresa L. Fricke, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT OF JUSTIN JONES

STATE OF WASHINGTON)

) SS

COUNTY OF PIERCE)

I, JUSTIN JONES, a Special Agent with Homeland Security Investigations,
Albany, New York, having been duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Department of Homeland Security, U.S. Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”) since April 2009, and have been assigned to Albany, New York since my appointment. I have worked investigations involving financial and smuggling violations, immigration violations, financial crimes, commercial fraud, human trafficking, narcotics smuggling, and child pornography/exploitation. I have received training and experience in interviewing, interrogation techniques, arrest procedures, search and seizure, white collar crimes, and various other crimes. In the course of conducting and assisting with HSI investigations, I have been involved in the use of the following investigative techniques: interviewing confidential sources and cooperating witnesses; conducting physical and electronic surveillance; reviewing financial records; and the execution of search and arrest warrants. As a federal agent, I am authorized to investigate violations of the laws of the United States and to execute arrest and search warrants issued under the authority of the United States. I am a graduate of the Criminal Investigator Training Program, and ICE Special Agent Training Academy, taught at the Federal Law Enforcement Training Center (“FLETC”), located in Glynco, Georgia. As a result of my training and experience, I am familiar with how various drugs are used and the typical distribution and trafficking methods used by drug dealers and traffickers. In addition, I am also familiar with the typical methods used by traffickers to “courier” and clandestinely transport

1 controlled substances, including through the use of “darknet” markets such as AlphaBay,¹
 2 the TOR network (a/k/a “the Onion Router”), encrypted messaging applications, and the
 3 use of intermediary couriers (a/k/a “dropshippers”) to facilitate the distribution of
 4 controlled substances. I have become familiar with drug smuggling, trafficking and
 5 distribution schemes, as well as, the laws relating to drug smuggling, trafficking and
 6 distribution, the interpretation and application of federal laws, and federal court
 7 procedures. I have conducted and participated in several investigations relating to drug
 8 smuggling and trafficking, and have participated in searches and seizures of locations
 9 utilized to store and traffic drugs.

10 2. The facts in this affidavit come from my personal observations, my training
 11 and experience, and information obtained from other agents and witnesses. This affidavit
 12 is intended to show merely that there is sufficient probable cause for the requested
 13 warrant and does not set forth all of my knowledge about this matter.

14 **PURPOSE OF THIS AFFIDAVIT**

15 3. This affidavit is submitted in support of an application under Rule 41 of the
 16 Federal Rules of Criminal Procedure for a warrant to search the following:

17 a. the person of Austin Michael HASKINS (DOB: XX/XX/1994)
 18 (“HASKINS”);

19 b. 3411 Bridgeport Way W., Apartment 9, University Place,
 20 Washington, as well as any common areas in or associated with the building containing
 21 Apartment 9 (hallways, lobby, foyers, yard, patio, parking), and any storage units,
 22 lockers, closets, garages, or other locations on the property assigned to Apartment 9
 23

24
 25 ¹ AlphaBay was an online darknet market that allowed anonymous trading and communications
 26 and was accessible through the use of the TOR overlay network. The TOR network (a/k/a “The
 27 Onion Router”) is an encrypted network that anonymizes web traffic and the location of
 28 computers by, *inter alia*, masking the user’s IP address. By accessing TOR, through the use of
 special software that is readily available on the Internet, TOR users are able to visit websites
 within the TOR network, known as “hidden services,” including darknet websites such as
 AlphaBay.

1 (the "SUBJECT PREMISES");

2 c. a green-grey 1996 Toyota Camry (VIN 4T1BG12K4TU78480) with
3 Washington State license plate BCM3156, registered to Austin Michael HASKINS (the
4 "SUBJECT VEHICLE"); and

5 d. P.O. Box 12000, Olympia, WA 98508-1200 (the "PO BOX");
6 as further described in Attachment A, attached hereto and incorporated herein, and to
7 seize from those locations evidence of violations of 18 U.S.C. § 1956 (money
8 laundering), 21 U.S.C. § 841(a) (1) (distribution of controlled substances), 21 U.S.C. §
9 843 (use of a communication facility in furtherance of drug trafficking) and 21 U.S.C. §
10 846 (conspiracy), as further described in Attachment B, attached hereto and incorporated
11 herein.

12 4. HASKINS is a 23-year old male who, according to Washington State DMV
13 records, resides at 3411 Bridgeport Way W., Apartment 9, University Place, Washington,
14 98466, as of June 2018. As detailed herein, HASKINS has used the 3411 Bridgeport
15 Way W. address in dealings with law enforcement to facilitate the distribution of LSD.²
16 A photograph of HASKINS is contained in Attachment A.

17 5. The SUBJECT PREMISES is located within the "Bridgeporter" apartment
18 complex at 3411 Bridgeport Way W. The Bridgeporter is a multi-unit apartment
19 building, green in color, with white trim. The numbers "3411" are visible from
20 Bridgeport Way W. Apartment 9 has a red door with a black number "9" located above
21 the door. The door to Apartment 9 faces west toward Bridgeport Way W. Photographs
22 of this location are contained in Attachment A.

23 6. The SUBJECT VEHICLE is a green-grey 1996 Toyota Camry (VIN
24 4T1BG12K4TU78480) with Washington State license plate BCM3156 registered to
25

26
27 ² A law enforcement database check on June 3, 2018, indicated that HASKINS is also associated
28 with an address at 7902 27th Street, Apartment J., University Place, Washington. As noted,
herein, however, the SUBJECT VEHICLE and HASKINS have been observed at the SUBJECT
PREMISES subsequent to June 13, 2018.

1 HASKINS. As detailed herein, law enforcement has observed HASKINS driving the
 2 SUBJECT VEHICLE on January 24, 2018, in connection with a meeting with an
 3 undercover law enforcement officer concerning a Bitcoin for cash transaction.
 4 Additionally, the SUBJECT VEHICLE is registered with the Washington State DMV to
 5 HASKINS at the SUBJECT PREMISES. A photograph of the SUBJECT VEHICLE is
 6 contained in Attachment A.

7 7. The PO BOX is a standard Post Office Box located at a U.S Post Office in
 8 Olympia, Washington.

9 8. This application is being presented by electronic means pursuant to local
 10 Criminal Rule CrR 41(d)(3).

11 DETAILS OF INVESTIGATION

12 9. On March 13, 2018, HASKINS, using the telephone number (206) 485-
 13 0673, exchanged numerous SMS text messages with an HSI confidential source
 14 (“CS1”).³ Law enforcement is monitoring the activities of CS1 by, *inter alia*, inspecting
 15 and downloading content from CS1’s electronic devices, including CS1’s smartphone
 16 (which CS1 uses to communicate with HASKINS) and personal computers. CS1 told
 17 law enforcement that, prior to CS1’s arrest, CS1 and HASKINS had a relationship
 18 whereby CS1 would cause LSD to be shipped to HASKINS (primarily from third parties
 19 over the Internet) and HASKINS would, in exchange for a fee, ship LSD to customers on
 20 behalf of CS1. A review of digital records seized from CS1—including a digital ledger
 21 of drug transactions maintained by CS1—confirms CS1 had dealings with HASKINS
 22 prior to CS1’s arrest. Specifically, as detailed below, on June 15, 2018, HASKINS
 23 emailed CS1, at CS1’s request, eight Microsoft Excel files (a/k/a “books”). A
 24

25 ³ CS1 is cooperating with authorities in an effort to obtain leniency in connection with pending
 26 state and federal charges related to the distribution of significant quantities of LSD (i.e., over 150
 27 grams) and MDMA (i.e., over 40 kilograms) over the “darknet.” CS1 does not have any reported
 28 criminal history other than these criminal charges. CS1 has, since becoming a cooperator,
 provided reliable information to law enforcement resulting in the seizure of significant quantities
 of controlled substances and proceeds.

comparison of these files with files recovered from a thumb drive seized from CS1, pursuant to a search warrant, confirmed that two of the files were forensically identical, and the other six files provided to CS1 via email were consistent in terms of file names and content. The two identical files, "L Meth 4.18.xls" and "L METH 4.20.xls" reflect names, addresses, quantities, and other information for the shipment of LSD. Additionally, HASKINS corroborated his prior criminal relationship with CS1 during recorded phone conversations and electronic communications, including SMS text messages, with CS1, as detailed below. Based on their prior dealings, and at the instruction of law enforcement, CS1 began communicating with HASKINS about working together again to distribute LSD via the darknet by using CS1's verifiable online identity, "Pelican," which is renowned on darknet markets as a reliable provider of high-quality LSD and MDMA. A portion of the SMS text messages between CS1 ("Outgoing") and HASKINS ("Incoming") are below:

Date	Time	Direction	Content
3/13/2018	08:35:37 PM EDT	Incoming	I love that show! It's fucking dope. I'm getting ready to go pay some bills and pick up a bunch of priority envelopes lmao
3/13/2018	08:39:43 PM EDT	Outgoing	Make a thrown out of them.
3/13/2018	08:42:14 PM EDT	Incoming	You think I won't? This is gonna be crazy
3/13/2018	08:43:51 PM EDT	Outgoing	I want to see stacks lol
3/13/2018	09:02:04 PM EDT	Incoming	Lmao fine, I'm gonna take pics for you later. I'm trying to hit up every place I can since this is gonna happen
3/13/2018	09:03:35 PM EDT	Incoming	I'm gonna take a picture of the 110 pages covering the entire floor. Lol
3/13/2018	09:04:19 PM EDT	Outgoing	I want to post a photo of all the mailers saying #vendorprobs
3/13/2018	09:05:21 PM EDT	Incoming	When we get all the pages I could take a pic of them lined up all over the floor around the envelopes. That way bitches know we are packing heat.

1	3/13/2018	09:05:51 PM EDT	Incoming	I am coming up with a new pelican name. That way I can do CS and have my gf do it when I'm too lazy or out shipping
2				
3	3/13/2018	09:08:49 PM EDT	Outgoing	Brother_Pelican tehehehe I am trying to appeal my pelican_vrndor ban. How many tabs do you think you shipped total how many packages
4				
5				
6	3/13/2018	09:16:01 PM EDT	Outgoing	So are you retiring sister pelican name? You have to talk like either a thug or a by bible kind of gentleman I prefer Brother_Pelican being iblical thought
7				
8				
9	3/13/2018	09:20:53 PM EDT	Incoming	Definitely retiring her name. I shipped around 250,000 tabs. And probably shipped 2,000+ packs without a doubt. I want to be biblical brother pelican
10				
11	3/13/2018	09:21:07 PM EDT	Incoming	I'm making the name when I get home
12				
13	3/13/2018	09:21:12 PM EDT	Incoming	90% plus of all orders was 1 sheet man
14				
15	3/13/2018	09:21:30 PM EDT	Incoming	Probably sold a bit more L and had closer to 2500 packs
16				
17	3/13/2018	09:57:56 PM EDT	Incoming	Have you ever thought about there being two pelicans? Like we could have your account, ship all that mdma, presses, etc through it. Then eventually turn Brother_Pelican into the acid hub or something. I could run that eventually and do a shit ton of acid. But I give you a cut of everything. Or you could still pay for L and we'd do a split. I could do tons of bulk acid through that but you wouldn't have to worry about all the fucking customers. I could be the acid hub.
18				
19				
20				
21				
22				
23	3/13/2018	10:00:00 PM EDT	Outgoing	Never really thought of it if we can just get bulk customers shit is ez then
24				
25	3/13/2018	10:11:49 PM EDT	Outgoing	Btw if you call this number I have it on me more often that not.
26				
27	3/13/2018	10:15:31 PM EDT	Incoming	Perfect. Yeah, and you could control the PIN to it, and we'd both have the PGP pass for it. That way you're in control but I can't
28				

			withdrawal all the coin or anything. But I doubt you'd. E too worried about that.
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10. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS exchange is a conversation about CS1 and HASKINS collaborating to sell LSD (a/k/a “acid” a/k/a “tabs” (i.e., one dose of LSD) a/k/a “sheets” a/k/a “pages” (i.e., a piece of paper containing numerous “tabs”) online. HASKINS tells CS1 that he is excited about resuming the sale of LSD online with CS1 and, in preparation, has been going to multiple locations to acquire shipping supplies (a/k/a “mailers” a/k/a “priority envelopes”) to mail LSD to customers. HASKINS tells CS1 that he will take photographs of the shipping supplies and LSD spread on the floor and use those photographs to sell the LSD online by showing potential customers (i.e., “bitches”) they are “packing heat” (i.e., have plenty of LSD available). HASKINS also talks about creating a new online pseudonym, “BROTHER_PELICAN,” and “retiring” (i.e., discontinuing) his old online pseudonym, “SISTER PELICAN,” to advertise and sell LSD online. CS1 asks HASKINS how much LSD HASKINS previously shipped to CS1’s customers, based on their prior interactions. HASKINS responds that he shipped approximately 250,000 doses of LSD over approximately 2,000 shipments, and notes that 90% of their prior orders were for one sheet of LSD per shipment. HASKINS and CS1 also discuss the possibility of maintaining a jointly-operated pseudonym account that they could use to sell LSD collaboratively—rather than relying on CS1’s online reputation and pseudonym—and discuss the logistics of how that would work, including by each having “the PGP pass” (i.e., encrypted password) for the jointly-operated account.

11. On March 14, 2018, HASKINS, again using the telephone number (206) 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS text messages between CS1 (“Outgoing”) and HASKINS (“Incoming”) are below:

3/14/2018	02:12:28 PM EDT	Incoming	Bout to make the account bruh. SQUAWK SQUAWK. When we have the Cid, I should take a photo of dozens of
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			pages covering my floor with hundreds of shipping envelopes lmao. Then we can use that to hype the acid comeback
3/14/2018	02:13:24 PM EDT	Incoming	I am trying to write a brother pelican sermon about acid. Like I'm a preacher and we are bringing our devoted followers the gift of eternal life.
3/14/2018	02:58:14 PM EDT	Outgoing	This is going to be great hopefully the mods don't delete it.
3/14/2018	03:26:57 PM EDT	Incoming	They definitely won't, there's no reason for them to. So long as we don't mention price or anything. The account is made. I'm so stoked this is happening, my gf is stoked too. It's her birthday and I'm getting priority envelopes before I pick her up from school lmao
3/14/2018	03:31:33 PM EDT	Outgoing	You posted it already?
3/14/2018	03:31:56 PM EDT	Incoming	No dude, I just created the account
3/14/2018	03:32:09 PM EDT	Incoming	I don't have the pages yet obviously
3/14/2018	03:32:37 PM EDT	Incoming	I figure it'll be a few weeks before we know what's happening
3/14/2018	03:32:40 PM EDT	Outgoing	I meant the brother pelican vs post lol
3/14/2018	03:34:13 PM EDT	Incoming	No, not yet. Waiting for the L stuff to happen before our holy brother makes his appearance. He shall ascend from the heavens and quench the thirst for enlightenment

3/14/2018	10:27:33 PM EDT	Incoming	When ju want 2 chat boi
3/14/2018	10:32:25 PM EDT	Outgoing	When do youmm
3/14/2018	11:25:59 PM EDT	Outgoing	Call me when you want bigboi it's getting late here

3/14/2018	11:27:36 PM EDT	Incoming	Kkkk one sec
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12. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS between CS1 and HASKINS is a conversation about CS1 and HASKINS resuming the distribution of LSD (a/k/a “CID” a/k/a “acid” a/k/a “pages”) online. HASKINS talks about making “the account,” i.e., the previously-discussed online pseudonym “BROTHER_PELICAN,” and again talks about taking photographs of LSD (a/k/a “pages”) and shipping envelopes on his floor and posting them on online markets to “hype” the LSD. HASKINS assures CS1 that the “mods” (a/k/a moderators) of various forums will not delete those promotional photographs as long as they do not mention prices. At 10:27 p.m., HASKINS asks CS1 to speak on the phone, and at 11:25 p.m. CS1 tells HASKINS to call CS1.

13. Two minutes later, on March 15, 2018, at 11:27 p.m., CS1 received a phone call from HASKINS using the telephone number (206) 485-0673. The conversation was recorded, and CS1 confirmed that the caller was HASKINS, whose voice he recognized based on their prior verbal communications. Relevant excerpts of the call are below:

7:30 minutes

HASKINS: “Yeah cause around this time is when we did the giant sale last year.”

13:35 minutes

CS1: “Do you want to hear my idea for TRUST?”⁴

HASKINS: “Fuck yeah, I’m so hard for this.”

15:10 minutes

⁴ TRUST a/k/a TEAMTRUST a/k/a TRUSTINUS a/k/a TIU a/k/a T (“Trust”) is, per CS1, one of the primary suppliers of LSD for CS1. I also know, from my training, conversations with other law enforcement, and this investigation, that “Trust” sells significant quantities of LSD online. In connection with this investigation, law enforcement has received seized quantities of confirmed LSD from “Trust” (as well as LSD and MDMA from CS1).

1 HASKINS: "Wait what's the plan though, what's the plan with TRUST?"

2 CS1: "So, alright, so, I'm thinking if we do it, we might as well get the best
3 price we can get from TRUST, which, um, I know, I mean every
4 single time he's offered L, it's been, um, the best prices is when you
5 buy 100,000 tabs, right?"

6 HASKINS: "Yeah."

7 CS1: "So I figure, um, we put down, we both put down 50, right? You get
8 100...."

9 HASKINS: "Yup."

10 CS1: "I don't know if he's gunna ship it all at once. Or. So here's the thing
11 too. Um. Based off the...What the fuck? Based off the post,
12 on...excuse me... on, on um, The HUB, it looks like he's laying the
13 Pelican print. (unintelligible)... and everything else, cause he's
14 stressed and he's going to be a dick. But it's also going to be cheaper
15 to buy. I think we need to get it like, in the same, ah, the same
16 strength, the 100-115 or 100-110 micrograms, whatever it was. Um."

16 HASKINS: "Yeah"

17 CS1: (unintelligible) "...so if we both throw in \$50,000, we get the best
18 price you can do it. Probably no promoter bullshit, I don't know, I'm
19 down for it, but like, realistically, I don't even need it."

20 HASKINS "I can get, I, yeah, we can get everything ready."

21 CS1: "Also like. You know what, we're probably better off just having it
22 pre-packaged and selling it as it comes. Because, like, there's no point
23 to like, to like spook people and like. I don't know, why don't we do
24 it like normal. It's not like it's that big of a deal. The only benefit we
25 had from the pre-sale, is we sucked up everyone's money, so they
26 couldn't order from somebody else because all their money was tied
27 up with us...(unintelligible)."

28 HASKINS: "But I think we'll still, like, dude, none of, it was like all those were
basically new, new customers when we did that. Like I've looked
through the order books."

1
2 *17:15 minutes*

3 HASKINS: "Like dude, we're going to fucking smash. Like I plan on, I was
4 thinking, like we'll do the first hundred and then we'll order, you
5 know, another 50, then another 50, and another 50 and another 50.
6 And be like, you know..."

7 *17:37 minutes*

8 CS1: "So if you don't have any bitcoin, I think it'll be easier for you to mail
9 it to me, like the cash, right and I'll just use bitcoin."

10 HASKINS: "I, yeah, I have like..."

11 CS1: "But if you don't have any bitcoin, you can just do that but if you have
12 cash, I know you can mylar."

13 HASKINS: "Yeah I have, let me check my, ah, electrum. I think I have like 2
14 bitcoin. So, I'm just send the rest in cash."

15 *19:00 minutes*

16 CS1: "So yeah I figure, if we do, there's two situations right? Um. We
17 don't know who's going to be buying from TRUST, so I don't know
18 what the scenes going to be like. We can do like we did last time, we
19 could set the price, either in the middle, a like a mid-price range,
20 where all the numbers will follow, will follow us, right? And people
21 will just come to us because we have the best price. Or we can do
22 what we did that one time where we were making \$10 a sale. But we
23 had so many sales it didn't even matter."

24 HASKINS "I think we definitely shouldn't do 10 bucks a sale. Like, that would
25 be insanely low."

26 CS1: "Yeah but we, that's what we did the, I mean that's what the bicycle
27 day sale essentially was."

28 HASKINS: "Yeah that was ten bucks a..."

CS1: "Maybe it was 15, but we killed it though."

1 HASKINS: "Yeah."

2
3 CS1: "The orders were, I mean, you shipped, I think you shipped 300
4 packages a day once. I mean that was the back log you know."

5 HASKINS: "Yeah but on, ah, last, last year though, not the summer, but the, ah,
6 when we did like the most ever, we did like 250,000 tabs. Ah we were
7 making like \$100..."

8 CS1: "Alright so, I think you've shipped like 200,000 because I can only
9 account for six orders from TRUST. And the maximum order was for
10 50,000. Actually no, six orders, cause three were 50,000, the rest were
11 25,000 tabs. The first two were 25,000 tab orders. And I don't even
12 think, regardless, it was like, it was like 150,000 – 200,000 tabs.
13 But..."

14 HASKINS: "But we can, I think we can make, cheaper going for like 220 a pop
15 right now."

16 CS1: "...so yeah we'll sell them for 200 bucks and get them moving."

17 HASKINS: "We should make good money on that, right?"

18 *21:33 minutes*

19 HASKINS: "Yeah and I wanna do like, dude, I'm in the game to do this to like,
20 like 300-400,000."

21 CS1: "Holy shit. Alright, if you're down to do it, we can do it."

22 HASKINS: "Bro I got, I'm going to close my laptop, I've got my girlfriend."

23 HASKINS: "My girlfriend is ready to help me ship. Like she's ready to type up
24 labels."

25 CS1: "Didn't she help last year?"

26 HASKINS: "Ah, no, I was like, when she did help, no she did help the first time
27 we did something and she did an amazing job. But my mom will help
28 too if I need it. But I don't think I'll need her help. But dude, no, I

1 can do that much. You know, dude when I had my own vending
2 account, I did like, ah, like 700 plus orders in a month. I was able to
3 do.”

4 CS1: “What were you selling?”

5 HASKINS: “Ah, MDMA, MDMA, cause I bought it from you.”

6 *23:05 minutes*

7
8 HASKINS: “But like I’m down, I was thinking we’d do like 300-400,000 tabs and
9 I’m, I’m also down to, um, like drive to another”

10 CS1: “How much, how much M, do you think you’ve shipped? That was
11 under, that was under, um, cause, I think you ever did M did you?
12 (Unintelligible) KACIKZ”

13 HASKINS: “How much did I ship?”

14 CS1: “I’m just curious. Yeah from KACIKZ like the stuff that you bought.
15 (unintelligible)”

16 HASKINS: “I think I did like, ah, like 4 keys. Cause I only did that, it, I sold like
17 half a key a week.”

18 CS1: “Now, now, will you like tell me, I’m just curious, will, will you tell
19 me what vendor account you used?”

20 HASKINS: “Yeah dude, I was, ah, I was UNITYUSA.”

21 *33:57 minutes*

22 HASKINS: “And I was thinking that, ah, if you wanted I could lay out a tarp
23 somewhere and I could lay out like a hundred pages or something.
24 When I get it just for you.”

25 CS1: “How many mailers do you think you have so far?”

26 *34:43 minutes*

27
28 HASKINS: “I was thinking I would order, ah, like 10 or 12 boxes of mailers to

1 my parents' house."

2 CS1: "How much...is there 50 in those or er..."

3 HASKINS "100 in each."

4 CS1: "Oh yeah that'll do it."

5 HASKINS: "Maybe 1,500 to get prepared for this shit."

6 *38:16 minutes*

7
8
9 HASKINS: "But. Yeah. No. We specifically did well over 1,000 orders last
10 time. And that was when I was like not in a good place. Now I can
11 work fucking 3 times as hard. Like dude, I can do this shit. I can
12 probably pack 400 packs in a day if I needed."

13 *39:46 minutes*

14 HASKINS: "And I plan on that we're going to keep going back in on it too."

15 CS1: "So I was thinking, if you, if you pitch in on it, you wanna do 60/40
16 you?"

17 HASKINS: "Ah if I'm shipping it? So I was thinking 50/50 for your half, but..."

18 CS1: "Well I was thinking, I was thinking, if we both throw money down
19 to buy it, right? If you're shipping it, you're getting, from profit,
20 you're getting 60% profit, I'll take 40. And you're also getting, you
21 know you're also getting your money back that we're paying for
22 postage, so you're also getting the postage fee, obviously because
23 you're paying for postage. And we know how fast postage adds up."

24 *43:01 minutes*

25 HASKINS: "So like I'm, I'm down if we do like 400,000 tabs or even fucking
26 half a million over a period. I'm down with doing other stuff after
27 that too."

28 CS1: "Yeah. Ok, what do mean, like M?"

1 HASKINS: "Yeah, like I'm down with the press."

2 *43:55 minutes*

3
4 HASKINS: "Yeah see I have no in real life stuff. I have drops not in my name,
5 not with my face attached, (unintelligible). I can get a bunch bro."

6 *46:16 minutes*

7 HASKINS: "I just did the math. Bro I just did the math, on like the cut that I was
8 thinking we would do. That was like, ah, I don't, it was like more
9 harsh than that. Except for, ah, like the only difference is that with
10 our cut that you said, I'd have \$300,000 made in profit or so. Once I
shipped, 500,000 tabs, but ah..."

11 CS1: "Yeah, let's say, so let's say its 500,000 tabs, right. Let's just say
12 we're making \$50 a tab, there's 50 on a sheet, that's \$250,000. Yeah
13 actually 50, 40, yeah you'd be making \$300,000. Which is pretty
ridiculous."

14 HASKINS: "Yeah dude I'm down with that and I'm down with not putting
15 (unintelligible) cut."

16 *47:47 minutes*

17
18 HASKINS: "No bro I have like literally a stack of like \$150,000"

19 CS1: "I hate you."

20 HASKINS: "Bro I can cash out. The thing is too, I'm a going to be able to cash
21 anything you need out too. And I get 10% from the people I sell it to,
22 to 15%. But, yeah, no dude I'm down with 60/40, especially if you're
23 gunna be willing to keep doing more and more acid. And then we can
do other stuff."

24 CS1: "Yeah. I think that's more fair than (unintelligible), I think that's fair,
25 you know."

26 HASKINS: "Yeah I mean hey, shit, and I'm covering half of it anyway. Like we
27 can just keep..."
28

1 CS1: "Exactly."

2 14. Based on my training, experience and participation in this investigation, as
 3 well as communications with CS1, this phone conversation between CS1 and HASKINS
 4 is an ongoing conversation about CS1 and HASKINS resuming the distribution of LSD
 5 online. Specifically, the two discuss buying, and redistributing, between 100,000 and
 6 500,000 doses of LSD from "Trust." They discuss the strength of the LSD (e.g., "100-
 7 115 or 100-110 micrograms") and the fact that the LSD supplier, "Trust," is using
 8 "Pelican print" (i.e., placing images of pelicans on the LSD sheets, consistent with their
 9 prior arrangement). HASKINS then tells CS1 that because he does not have a large
 10 quantity of digital currency available, he will mail cash to CS1 (in Mylar bags) so that
 11 CS1 can then order the LSD from "Trust." HASKINS and CS1 then discuss prior sale
 12 promotions they used to increase orders of LSD (e.g., the "bicycle sale") and the fact that
 13 "the most ever we did like 250,000" tabs in one order from "Trust." HASKINS and CS1
 14 also discuss that HASKINS obtained MDMA a/k/a ecstasy from CS1, and that
 15 HASKINS was distributing multiple kilograms of MDMA that he obtained from CS1 as
 16 well as another online MDMA supplier (i.e., "KACIZK"). HASKINS and CS1 discuss
 17 how they will divide the profits from the sale of the LSD.

18 15. On March 18-19, 2018, HASKINS, again using the telephone number (206)
 19 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS
 20 text messages between CS1 ("Outgoing") and HASKINS ("Incoming") are below:

21	03/18/2018	09:38:15 PM EDT	Incoming	The Danwin site has issues receiving emails from other places
22	03/18/2018	09:38:20 PM EDT	Incoming	Email sent though
23	03/18/2018	10:04:22 PM EDT	Incoming	Sent tmg one too
24	03/19/2018	06:48:19 PM EDT	Incoming	Noting from t yet
25	03/19/2018	06:49:02 PM EDT	Outgoing	He sent a short message
26				
27				
28				

03/19/2018	06:49:43 PM EDT	Incoming	good or bad?
03/19/2018	06:50:10 PM EDT	Outgoing	He saidnhe is busy right now
03/19/2018	06:51:29 PM EDT	Incoming	What do you think that means? Busy for a few hours?days? Or did he pop into chat
03/19/2018	06:51:47 PM EDT	Outgoing	Days
03/19/2018	06:52:10 PM EDT	Incoming	That's not a bad sign
03/19/2018	06:57:13 PM EDT	Incoming	What do you think? Also, I'm gonna be starting TRT

16. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS exchange between CS1 and HASKINS is a conversation about CS1 and HASKINS obtaining LSD from "Trust" (i.e., "T"). HASKINS tells CS1 that he was having trouble with an anonymous email service (i.e., the "Danwin site") but that he sent emails to potential suppliers. CS1 tells HASKINS that he communicated with "Trust" and that "Trust" indicated he was busy and it would be "days" before "Trust" would be in a position to sell LSD to CS1 so that CS1 could send it to HASKINS. HASKINS also tells CS1 that he is going to start using steroids, including "TRT" (i.e., testosterone replacement therapy).⁵

⁵ On April 16, 2018, HASKINS and CS1, via SMS text, had an extensive, unrelated conversation about HASKINS' use of steroids. For example, HASKINS told CS1 "Dbol and 1g test feels amazing" and that "I'm front loading for a cycle, that's all. 1 g this week, then 500 for the next 12. Then down to 200-250 regularly" and that he was "just making sure I can get nice and juicy." CS1 warns HASKINS to "do some homework before doing a cycle. TRT is to normal you out not to just k up your test to a roid user. If you're trying to abuse it do homework regardless," to which HASKINS responds "Oh I have been doing it. Most of the recommendations have been to run test at 500mg for 12 weeks with only 4 weeks dbol. I'm trying to heal the muscle around my back. I've been all up in this shit. It's cheaper to order test online than pay to go to the doctors. So I gotta get blood draws, but still \$30 pays for 2 months." HASKINS also tells CS1 "I have HGC so my balls don't shut down nor does any of the important stuff. Also have an AI to handle estrogen." Based on my training and experience, and conversations with CS1, HASKINS and CS1 are discussing the fact that HASKINS possesses anabolic steroids and is using them illegally.

17. On April 3-6, 2018, HASKINS, again using the telephone number (206) 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS text messages between CS1 ("Outgoing") and HASKINS ("Incoming") are below:

4/3/2018	01:45:15 AM EDT	Outgoing	I'm going to message trust tomorrow and try to start talking prices. Would you want to mail money to throw down or sum coin.
4/3/2018	02:16:40 AM EDT	Incoming	Yeah, Ill do both. Just lmk how much we are ordering and Ill make sure to keep enough coin for shipping. I can do the rest in cash.
4/3/2018	12:12:43 PM EDT	Outgoing	25-50k we both throw in? Thoughts?
4/3/2018	07:17:38 PM EDT	Incoming	Yep I'm down
4/3/2018	07:17:55 PM EDT	Incoming	I didn't get this until now for some reason, sorry papa. Just hit the gym for 3 hours.
4/3/2018	07:18:07 PM EDT	Incoming	25-50k to start and then see how everything goes
4/3/2018	07:38:37 PM EDT	Outgoing	Sounds good
4/3/2018	11:39:20 PM EDT	Incoming	Kk
4/4/2018	12:55:00 PM EDT	Outgoing	What were trusts other emails. I'm having issues signing in to the hub
4/4/2018	01:09:13 PM EDT	Incoming	Ok daddy, let me check
4/4/2018	03:25:06 PM EDT	Incoming	You can pop on my TMG and send him a message, I'm finding his email now
4/4/2018	03:26:26 PM EDT	Outgoing	Will do cutiepie
4/4/2018	04:34:21 PM EDT	Outgoing	Tmg down
4/4/2018	04:34:44 PM EDT	Incoming	God damnit, I'm gonna send u his fucking ridiculously long email then.
4/4/2018	04:35:07 PM EDT	Incoming	Kk B.B.

1	4/4/2018	05:13:09 PM EDT	Incoming	TrustInUs@tt3j2x4k5ycaa5zt.onion. You have to set up a danwin email to send a message to it. He is locked out of his secmail.
2	4/4/2018	05:14:35 PM EDT	Outgoing	That's a lie secmail doesn't have lock
3				our for in proper logins lol what are his
4				emails aside from that one.. I like to be a
5				pain but I'll make one if I have to
6	4/4/2018	05:15:43 PM EDT	Outgoing	In having issues signing in to anything
7				on tor. About to reinstall Windows if I
8				have to. Using a remote server to
9				browse tor software doesn't like me
10				right now
11	4/4/2018	05:16:43 PM EDT	Incoming	He probably locked himself out aka
12				forgot his password because he suffers
13				from retard disease. AKA that fuckin'
14				bird flu. My whonix is working A-
15				OKAY. Let me see if I can find other
16				ones; I can always just send u my sister
17				pelican login.
18	4/4/2018	05:18:50 PM EDT	Incoming	Login is
19				sisterpelican@tt3j2x4k5ycaa5zt.onion.
20				Darwij55ss
21	4/4/2018	05:26:06 PM EDT	Outgoing	Is retarded disease contagious
22	4/4/2018	05:26:35 PM EDT	Outgoing	Okay I'm going to try that onion.
23	4/4/2018	05:27:00 PM EDT	Incoming	It's contagious but jokes on him, we are
24				immune carriers. We blow our bird
25				loads into people and give them retard
26				disease.
27	4/4/2018	05:27:43 PM EDT	Outgoing	Oh god
28	4/4/2018	06:02:13 PM EDT	Incoming	LOL
	4/4/2018	06:03:39 PM EDT	Incoming	Im glad BTC is low, we are going to
				make a lot of fucking BTC. Ill probably
				sell most of it after we re-up a few
				times, but Im still stoked.
	4/5/2018	03:19:13 PM EDT	Incoming	Any news, Papi?

1	4/5/2018	03:20:06 PM EDT	Outgoing	Just waiting on T
2	4/5/2018	04:52:41 PM EDT	Incoming	Kkk, did u ever send a book or anything to my drop?
3	4/5/2018	05:00:26 PM EDT	Outgoing	Not yet was going to wait till your test made it first
4	4/5/2018	05:00:40 PM EDT	Outgoing	Did my message send
5	4/5/2018	05:23:16 PM EDT	Incoming	Got it! I'm gonna send my test today. It'll arrive tomorrow. Fuck driving 45 mins to check it lol
6	4/6/2018	05:41:51 PM EDT	Incoming	Hear anything yet? If not, try tmg.
7	4/6/2018	05:45:45 PM EDT	Outgoing	He is busy he responded he will get back to me.
8	4/6/2018	07:44:43 PM EDT	Incoming	Dope, I think my test pack landed today. If not it'll land tomorrow. SQUAAAWK.

18. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS exchange between CS1 and HASKINS is a conversation about CS1 and HASKINS combining their money to purchase LSD from "Trust." CS1 asks HASKINS if he would prefer to send CS1 cash or digital currency (i.e., "sum coin") that CS1 will use to purchase LSD from "Trust." HASKINS responds that he will send both. CS1 and HASKINS then discuss ways to contact "Trust," including prior secure email accounts used by "Trust." CS1 tells HASKINS that "Trust" told CS1 that "Trust" would get back to CS1 soon. HASKINS and CS1 also discuss a "test package" that HASKINS was sending to a P.O. Box—the details of which were communicated to CS1 from HASKINS via Wickr Me, an encrypted messaging application, as described further below—that HASKINS established for the purpose of receiving LSD from "Trust." HASKINS and CS1 also discuss that CS1 was going to send a test package to the P.O. Box after HASKINS confirmed that his test package was received without incident. HASKINS tells CS1 that it will take HASKINS 45 minutes to drive to the P.O. Box.

19. On April 11, 2018, HASKINS, again using the telephone number (206) 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS text messages between CS1 (“Outgoing”) and HASKINS (“Incoming”) are below:

4/11/18	11:38:30 PM EDT	Incoming	Ayyyy
4/11/18	11:38:35 PM EDT	Incoming	My drop is perfect

20. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS exchange between CS1 and HASKINS is a conversation wherein HASKINS confirms to CS1 that his “drop is perfect,” meaning that the P.O. Box that HASKINS obtained under the name Dominick Pastori, at P.O. Box 12000, Olympia, WA 98508-1200, was accessible to HASKINS, and that HASKINS had received a test package at that P.O. Box, and, therefore, CS1 and HASKINS could now use that P.O. Box safely to receive shipments of LSD from “Trust” (as previously discussed).⁶

21. On April 16-17, 2018, HASKINS, again using the telephone number (206) 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS text messages between CS1 (“Outgoing”) and HASKINS (“Incoming”) are below:

4/16/18	11:25:35 PM EDT	Incoming	How many packs should I send the cash in? Lmk what denominations you want too. I have either tons of fresh Benjamin’s or twenties etc.
4/16/18	11:57:37 PM EDT	Outgoing	Uhhh 1 or two express or priority. I like 100s
4/17/18	12:12:34 AM EDT	Incoming	;) I bet u do Papi, I know how 2 make u feel good. It’ll definitely be 2 different ones

⁶ Records obtained from the U.S. Postal Service confirm that P.O. Box 12000 was opened under the name “Dominic Pastori” on February 6, 2018, and the individual who opened that P.O. Box provided a state identification card, email address, and vehicle registration number. The P.O. Box has been paid for in cash.

22. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS exchange between CS1 and HASKINS is a conversation concerning HASKINS sending two “packs” of U.S. currency (i.e., “Benjamin’s” a/k/a one-hundred-dollar bills and “twenties” a/k/a twenty-dollar bills) to CS1 through the mail that CS1 will use to obtain LSD from “Trust.”

23. On April 19, 2018, over the course of several hours, CS1, using the Wickr Me account “birdscanfly,” communicated with HASKINS, using the Wickr Me account “Rabidbearjew.”⁷ Consistent with the discussions over SMS described above, CS1—pursuant to law enforcement instruction—told HASKINS to send the “cash” to “M Entertainment” located at 237 Main Street, P.O. Box 61, Ansonia, CT 06401-7736. Relevant excerpts of the conversation on April 19, 2018, between HASKINS (“Rabidbearjew”) and CS1 (“birdscanfly”) are as follows:

CS1: Send cash here
M Entertainment
237 MAIN ST
PO BOX 61
ANSONIA, CT 06401-7736

CS1: I wanted to make the name more gay

CS1: I was going to go say Bird Supply Warehouse but that is just odd

HASKINS: Hahahha

HASKINS: Bro I am looking for my PO box keys right now

CS1: still waiting on the sample order from trust

CS1: but figure we get the ball rolling in meantime

⁷ Wickr Me is an encrypted smartphone application that allows users to send messages (text, voice, or photographs) with time limits that cause the messages to expire and delete automatically. Law enforcement has configured a smartphone, controlled by law enforcement, to contemporaneously receive all communications sent or received by CS1 through CS1’s “birdscanfly” Wickr Me account.

1 HASKINS: It'll show soon

2
3 CS1: yeah I think I have mine otherwise asking the guy at the desk

4 CS1: give me tracking when you get the chance

5
6 HASKINS: I love that I trust you with 5 figures+

7 CS1: prob doesn't help I got like a dozen keys on my key ring that are all
8 brass like the po box keys

9 CS1: I read that as fingers and thought it was kinky

10 HASKINS: Bro I have ten sets of keys

11
12 HASKINS: I'd let you go knuckle deep in me

13 CS1: lemme ghuess

14 CS1: you never return your po box key for the \$2 deposit huh lol

15
16 HASKINS: You could wear me as a wedding ring, cause I'd bud like a rose for
17 you

18 HASKINS: The PO box isn't in my name, I wonder if I bring the receipt for it
19 and a fake utility bill if they'd give me a new key. I have two
20 packages in it.

21 CS1: prob

22 CS1: just say I don't have my id on me

23 CS1: but I did go to my mailbox on my way here and have some bills in
24 the car

25 HASKINS: I'll make fake insurance. Oh fuck no, Hahahaha. I've never
26 returned keys ever

27 CS1: you expressing the package

1 HASKINS: [sends voice message to CS1]

2 CS1: if so are I am assuming your going to just counter it

3 CS1: Please no GAY LUBE AND DILDOS written on outside of pack
4 they already think I am weird

5 HASKINS: [sends voice message to CS1]

6 HASKINS: Yeah. I will. I want to find the keys before I send. I'll go to the
7 counter and send two packages from two different post offices
8 maybe. I'll use a printed label tho

9 24. Based on my training, experience and participation in this investigation, as
10 well as communications with CS1, this Wickr Me exchange between CS1 and HASKINS
11 is a conversation concerning HASKINS sending U.S. currency to CS1 through the mail
12 that CS1 will use to obtain LSD from "Trust."

13 25. On April 24, 2018, HASKINS, again using the telephone number (206)
14 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS
15 text messages between CS1 ("Outgoing") and HASKINS ("Incoming") are below:

16 4/24/18	04:15:02 PM EDT	Incoming	Hey, I'm sending a test package before cash.
17 4/24/18	04:18:54 PM EDT	Outgoing	Sounds good
18 4/24/18	05:23:24 PM EDT	Outgoing	Yeah send like. Box of dicks first.
19 4/24/18	05:24:20 PM EDT	Incoming	Can U imagine sending 25k to some random PO box.
20 4/24/18	05:24:49 PM EDT	Incoming	I mean, I did touch a bunch of L without rubber gloves. So I don't put anything past myself.
21 4/24/18	10:57:07 PM EDT	Incoming	Ok U asked for it. Box of dicks on its way.

22 26. Based on my training, experience and participation in this investigation, as
23 well as communications with CS1, this SMS exchange between CS1 and HASKINS is a
24
25
26
27
28

1 conversation concerning HASKINS sending a test package to CS1 in advance of sending
2 actual U.S. currency, consistent with their communications over Wickr Me.

3 27. On April 27, 2018, HASKINS, again using the telephone number (206)
4 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS
5 text messages between CS1 (“Outgoing”) and HASKINS (“Incoming”) are below:

6 4/27/18	07:12:25 PM EDT	Incoming	Did everything arrive?
7 4/27/18	11:13:02 PM EDT	Outgoing	Will check tmw

9 28. Based on my training, experience and participation in this investigation, as
10 well as communications with CS1, this SMS exchange on April 27, 2018, between CS1
11 and HASKINS is a conversation concerning HASKINS asking CS1 to confirm CS1
12 received the text package in advance of sending actual U.S. currency.

13 29. On April 30, 2018, law enforcement retrieved package
14 92055901755477000071248446 from the U.S. Postal Service in Connecticut. The
15 package was addressed to M Entertainment, PO BOX 739, New Haven, CT 06503-0739⁸
16 and the return sender was Jacob Riley, 3312 Bridgeport Way West Apt 3, University
17 Place, WA 98466.⁹ Inside the package was a stuffed animal, a photograph of a penis,
18 and a yellow note with the phrase “I Love Big Fat Bird Cocks.”

19 30. On May 11-12, 2018, CS1, using the Wickr Me account “birdscanfly,”
20 communicated with HASKINS, using the Wickr Me account “Rabidbearjew.” Relevant
21
22
23

24 ⁸ CS1 provided this P.O. Box address—different from the address described above—to HASKINS
25 at law enforcement instruction. Law enforcement did not retain a copy of this communication
26 between CS1 and HASKINS. Subsequent to April 19, 2018, via Wickr Me, HASKINS sent CS1
27 a photograph of an adult male’s genital region with a U.S. Postal Service shipping label in front
28 accompanied by the message “I’m getting the tracking number.” The shipping label is illegible in
the photograph but generally matches the shipping label on the package that was ultimately
received by law enforcement at the P.O. Box in New Haven, Connecticut.

⁹ This is a different unit in the same complex where HASKINS resides.

1 excerpts of the conversation on May 11-12, 2018, between HASKINS ("Rabidbearjew")
2 and CS1 ("birdscanfly") are as follows:

3 CS1: Did you send it?

4 HASKINS: Sending now, I was waiting to see what you said. Should I send
5 \$40,000???

6 HASKINS: Is is going to be a very large front hahaha

7 CS1: Yeah lol all good

8 HASKINS: Hey, just a quick test. What was Pelican Jr's favorite band/artist?

9 CS1: Tracking when you can

10 CS1: Porter

11 CS1: Duh

12 CS1: Why?

13 HASKINS: Just had to make sure u are u. I'm gonna send you the tracking but
14 also the drop address to confirm.

15 CS1: Kk

16 HASKINS: PO BOX 739, New haven, CT 06503

17 HASKINS: M Entertainment

18 HASKINS: Gonna be like 5-7 packs

19 HASKINS: Or I can have them scan in over the counter

20 CS1: Ight

21 HASKINS: Oh boy, about to send u a pic

22 HASKINS: You stoked?

1 CS1: It might be better to do less packs but definitely do over the counter

2 CS1: That way we know its scanned and

3
4 CS1: Pic yeah

5 HASKINS: Sounds good. Less packs and I'll send express and probably hit
6 different post offices or something. I'm sure they won't lose these
7 packs.

8 HASKINS: They'll be overnight since I'll get them in before 2 I believe.

9 HASKINS: Need that new drop I have?

10 HASKINS: [sends two photographs of four banded stacks of U.S. currency]

11
12 HASKINS: Remember when T wouldn't ship to our PO box? He got salty about
13 it. If I send 40k any idea what front we are getting? Should I send
14 \$50k or is that too large? Are you matching what I send?

15 CS1: I'm going to match

16 CS1: I'll have trust send like a few of each artwork so like 10k of x art
17 work then 10k of x

18 CS1: So we can have all the prints?

19 HASKINS: Oh sick. Okay. You wanna start with 80k or do a full 100k?
20 Sounds like a great idea. No one ever minded last time.

21 CS1: Your call

22 CS1: Phone is dying btw

23
24 HASKINS: I'm gonna send 40k. Should get us fronts the size of last time. Do
25 you think he's gonna Double our purchase?

26 CS1: He told me if we spent 100k we would be a top tier buyer

27 CS1: He was going to give us a deal regardless
28

1 HASKINS: Oh lol

2 HASKINS: We will get all the prints, people shouldn't mind at all. He can also
3 send them all in the same big packages too. I'm gonna send 50k.
4 I'll send my drop address again in a day or two? Or you just gonna
5 ask before you place order?

6 CS1: I'm going to ask before I order

7 CS1: You can give me it again and I can write it down and I'll double
8 check again prior to the order if you want it doesn't matter

9 HASKINS: Yep. I'll do that. We are gonna make bank big boiii.

10 HASKINS: I'm sending 50k. Double my orig amount. Sending drop now, then
11 going and sending packs.

12 CS1: Kk big ass front lmao

13 HASKINS: LOL

14 HASKINS: The labels will be made on the DYMO for the packs hahahahaha

15 HASKINS: DOMINICK PASTORI
16 PO BOX 12000
17 OLYMPIA, WA 98505-1200
18 They should just leave it as 98508
19

20 CS1: Yeah but it will work

21 CS1: I don't know po boxes use 4 digits

22 HASKINS: Yeah they do, cool shit right?

23 HASKINS: [sends photographs of packs of currency and envelopes on coffee
24 table]
25

26 HASKINS: Sorting 150K lol. So many 20's bro.

27 CS1: Lmao I like 100s it's more manageable
28

1 HASKINS: Same lmao. After our first sale we are gonna mike this pile each
2 almost lol. Lord. We are gonna be rollin'

3 CS1: Let me know if you ship it today and got tracking

4 HASKINS: Gotcha sending in a moment

5 HASKINS: 92701901755477000000481230

6 HASKINS: 92701901755477000000481247

7 HASKINS: They scanned it in front of me, hasn't even updated to show that lol

8 HASKINS: Updated. It's leaving Seattle. Fuck yeah.

9
10
11 31. Based on my training, experience and participation in this investigation, as
12 well as communications with CS1, this Wickr Me exchange between CS1 and HASKINS
13 is a conversation concerning HASKINS sending \$50,000 in U.S. currency to CS1 so that
14 CS1 can purchase LSD from "Trust," which will be shipped to HASKINS at the P.O.
15 Box HASKINS obtained under the name Dominick Pastori, at P.O. Box 12000, Olympia,
16 WA 98508-1200.

17 32. On May 14, 2018, law enforcement travelled to the U.S. Post Office in
18 New Haven, Connecticut to recover a USPS Priority Mail Express Flat Rate Parcel
19 bearing tracking number 92701901755477000000481247 and USPS Priority Mail
20 Express Flat Rate Parcel bearing tracking number 92701901755477000000481230
21 (Parcel 2) from an address controlled by the U.S. Postal Inspection Service. Within
22 Parcel 1, law enforcement located a Tyvek mailing pouch which contained three separate
23 bundles wrapped in brown paper. Each of the bundles was secured with a rubber band.
24 Parcel 1 contained \$30,100 in U.S. currency. Within Parcel 2, law enforcement located a
25 Tyvek mailing pouch which contained three separate bundles of U.S. Currency. Parcel 2
26 contained \$16,400 in U.S. currency. The currency matched the photographs of currency
27 provided to CS1 by HASKINS via Wickr Me. The sender name and address for both
28 Parcel 1 and Parcel 2 is listed as "Austin Haskins, 3411 Bridgeport Way W., Apartment

9, University Place, Washington 98466.”¹⁰ The package is listed as having shipped on May 11, 2018.

33. On May 14, 2018, HASKINS, again using the telephone number (206) 485-0673, exchanged additional SMS text messages with CS1. A portion of the SMS text messages between CS1 (“Outgoing”) and HASKINS (“Incoming”) are below:

5/14/18	07:12:25 PM EDT	Incoming	Both landed
5/14/18	11:13:02 PM EDT	Incoming	Papa?
5/14/18	05:20:12 PM EDT	Outgoing	Squuuuawk. Once we get the order shipped from trust I'll get an order book made and sent to you.
5/14/18	05:30:55 PM EDT	Incoming	FUCK YEAH.
5/14/18	05:31:31 PM EDT	Outgoing	That fat pack of 20's and 50's. Lol
5/14/18	05:31:38 PM EDT	Incoming	I made that pack look legit as fuck.
5/14/18	05:32:31 PM EDT	Outgoing	What did you do to it?
5/14/18	05:33:26 PM EDT	Incoming	I just made it a rectangle, and it feels like a normal package. Like it has paper in it or little boxes.
5/14/18	05:33:48 PM EDT	Outgoing	Boxes of cassssh
5/14/18	05:34:05 PM EDT	Incoming	I just made sure everything was the same size and even. Then got it weighed and scanned it at the counter. Used a bubble mailer for the big pack of cash, and an envelope for The other 35k or so

¹⁰ On May 10, 2018, HASKINS, via Wickr Me, informed CS1 that HASKINS intended to use his real home address as the return address for the packages containing the U.S. currency because, in the event of a problem, he wanted the U.S. currency to be returned to him. Law enforcement did not retain a copy of this communication.

1	5/14/18	05:34:26 PM EDT	Incoming	The smaller/regular envelope has the most money in it. 33.5k I think.
2	5/14/18	05:34:51 PM EDT	Outgoing	What is in your package or a glass figurine hence the bubble wrap
3	5/14/18	05:36:08 PM EDT	Incoming	Lol, naw just a bubble envelope. Like they have express envelopes that are bubble mailers themselves.
4	5/14/18	05:38:38 PM EDT	Incoming	I'm stoked. What market we gonna be on?
5	5/14/18	05:41:59 PM EDT	Outgoing	I'm going to try to sell a good chunk direct before we pop on the market. But I'm assuming dream but I'm trying to have them fix my account.
6	5/14/18	05:46:17 PM EDT	Incoming	Ok cool. We aren't giving people fat deals, right? The idea is to sell direct to get hype going right? Dream should fix it. Someone has just been squatting on your name, right!
7	5/14/18	05:48:00 PM EDT	Outgoing	Nope just enough to get people flocking. Well direct because I got a few people that said they would buy when we some L. I don't want to presale on a market again
8	5/14/18	05:48:25 PM EDT	Outgoing	No by old account got wiped all sales not even vendor status anymore I had to make a new one.
9	5/14/18	06:11:27 PM EDT	Incoming	Damn, sounds good. Yeah, presale is a bad idea hahahah. Especially since a market like dream could just take our money. We will be careful this time but holy shit we are going to be rolling in dough. Maybe that kid I know can reach out to Dream for us

34. Based on my training, experience and participation in this investigation, as well as communications with CS1, this SMS exchange between CS1 and HASKINS is a conversation concerning CS1 having received the previously-discussed U.S. currency

1 from HASKINS, and discussing how that U.S. currency will be used to purchase LSD
 2 from “Trust,” which will be shipped to HASKINS at the P.O. Box HASKINS obtained
 3 under the name Dominick Pastori, at P.O. Box 12000, Olympia, WA 98508-1200.
 4 HASKINS and CS1 discuss that they will use the “Dream” darknet market to sell the
 5 LSD from “Trust” and that, initially, they will focus on selling LSD to established
 6 customers in order to rebuild their reputation online as a reliable source of LSD.
 7 HASKINS and CS1 discuss that they need to be cautious when using the “Dream”
 8 darknet market because CS1 had his account on “Dream” suspended previously and
 9 “Dream” could possibly steal digital currency held in escrow by “Dream” during pending
 10 transactions between CS1/HASKINS and their customers.

11 35. Since May 14, 2018, CS1 and HASKINS have had extensive
 12 communications, over SMS text message, Wickr Me, and voice calls, concerning the
 13 status of the LSD from “Trust” and their plans to distribute it. CS1 has told HASKINS
 14 that CS1 has communicated with “Trust” and is in the process of finalizing the
 15 transaction to purchase approximately \$100,000 worth of LSD from “Trust” which will
 16 be delivered to HASKINS at P.O. Box 12000, Olympia, WA 98508-1200. For example,
 17 on May 31, 2018, via SMS message, HASKINS told CS1 “Hopefully we get way lower
 18 price and tons of tab ASAP.” Additionally, CS1 has told HASKINS that CS1 is working
 19 to identify large-scale customers.

20 36. On June 15 and 17, 2018, HASKINS, again using the telephone number
 21 (206) 485-0673—as well as, at times, the number (360) 836-1421, which HASKINS
 22 previously provided to CS1 as an additional number where HASKINS could be
 23 reached—exchanged additional SMS text messages with CS1. A portion of the SMS text
 24 messages between CS1 (“Outgoing”) and HASKINS (“Incoming”) are below:

25 6/15/18	12:54:19 PM EDT	Outgoing	Hey random question do you have any of the old books still. I got an idea
26 6/15/18	01:30:34 PM EDT	Incoming	I think I can get. A few, what’s the idea?

6/15/18	01:33:57 PM EDT	Outgoing	Search markets for the buyers that bought big before and shoot them a message. Try to line up big buys off the bat also keep then direct. And I'm curious if you
6/15/18	01:34:18 PM EDT	Outgoing	Got Minerva's drop still.
6/15/18	01:50:56 PM EDT	Incoming	Holy shit
6/15/18	01:51:41 PM EDT	Incoming	I forgot i had Minerva's drop I have all order books from forever in a vault
6/15/18	01:52:09 PM EDT	Incoming	Buried hard drive on some property.figured we might need it for something like this lmao

6/15/18	01:59:37 PM EDT	Outgoing	You think it would be possible to email me the books you got
6/15/18	01:59:57 PM EDT	Incoming	Duh of course bro

6/15/18	02:00:56 PM EDT	Incoming	We are partners in crime. We know how to rhyme. We can stand the time.
6/15/18	02:00:59 PM EDT	Outgoing	#peliworlwide your first defense
6/15/18	02:01:07 PM EDT	Incoming	He also told me he was from Seattle
6/15/18	02:01:34 PM EDT	Incoming	Because we told him I live near where I dropped pax

6/15/18	02:38:49 PM EDT	Outgoing	Let me know when you send the email so I can start going through them.
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1	6/15/18	02:55:42 PM EDT	Incoming	Secmail throwaway. But I found a website that allows you to design your own festival flags
2				
3	6/15/18	02:56:12 PM EDT	Incoming	I made a really sick sister pelican flag but never ordered. I'm so stoked that this shit is really happening
4				
5	6/15/18	03:03:02 PM EDT	Outgoing	If your going to use secmail just send to the peli one.
6				
7	6/15/18	03:47:26 PM EDT	Incoming	K let me find the peli one. Let's utox sometime
8	6/15/18	03:51:09 PM EDT	Outgoing	Pelican@secmail.pro
9				
10	6/15/18	03:53:56 PM EDT	Outgoing	Pelican@secmail.pro
11				
12	6/15/18	03:55:06 PM EDT	Incoming	Kkk. I'm finding my old drives and setting my computer up.
13				
14	6/15/18	04:20:43 PM EDT	Incoming	I've almost found it. I've got a shit ton of vacuum sealing shit btw. I'm going through a bunch of boxes right now
15	6/15/18	04:25:19 PM EDT	Incoming	GOT IT
16	6/15/18	04:31:52 PM EDT	Incoming	Found a guy who ordered 60 sheet
17				
18	6/15/18	04:36:12 PM EDT	Incoming	I think I can find old chats with Minerva
19	6/15/18	04:37:18 PM EDT	Outgoing	Sweet send it over when you can
20				
21	6/15/18	04:43:40 PM EDT	Incoming	WAIT
22	6/15/18	04:44:39 PM EDT	Incoming	I think we used to name workbooks different things
23	6/15/18	04:44:57 PM EDT	Incoming	Can we talk in a bit?
24				
25	6/15/18	05:21:08 PM EDT	Outgoing	What do you mean. I might be around
26	6/15/18	05:23:05 PM EDT	Incoming	I meant voice chat for phone call to touch base on what we are doing etc. along with shit I need to buy. I'm
27				
28				

			pulling together all the shipping docs now.
6/15/18	05:23:48 PM EDT	Incoming	Like either utox voicechat or wickr phone call or phone call.
6/15/18	05:24:34 PM EDT	Outgoing	Yeah we can if I can't tonight we can talk tmw. Just doing errands
6/15/18	05:24:55 PM EDT	Incoming	Phone all works best wickr app crashes the app when I get calls
6/15/18	05:25:41 PM EDT	Outgoing	Zip the file before you send it or upload it to MediaFire first or something and send the link secmail has an email limit for attachments.
6/15/18	05:26:36 PM EDT	Incoming	Dope. Sounds good. I just wanna get on the same level so I know everything I need to do, stuff to get etc. I'm already ordering stuff but we gotta get in the habit of communicating since we're going to be undertaking a big project with this shit. Sounds good. I'm getting all the shipping files into a single place.

6/15/18	05:40:25 PM EDT	Incoming	I just dug up a thumb drive with this stuff on it. Encrypted with veracrypt. Inside a hidden volume. I thought you might need them.
6/15/18	05:49:03 PM EDT	Incoming	I don't think I have all of them
6/15/18	05:50:13 PM EDT	Incoming	It's an L pic
6/15/18	05:50:15 PM EDT	Outgoing	I guess send what you got there has to be a few dozen orderbook.
6/15/18	05:50:41 PM EDT	Outgoing	Yeah I think I started putting boobs in the photos in the L books
6/15/18	05:51:01 PM EDT	Incoming	Yeah, I was confused for a second.
6/15/18	05:51:29 PM EDT	Incoming	I was like "wait, wouldn't it say "g" next to it if it was a m order?"

1	6/15/18	05:52:29 PM EDT	Outgoing	Yeah it would
2	6/15/18	05:53:05 PM EDT	Incoming	Thought so. Good news, we have like
3				3k names from the L batches lol.
4	6/15/18	05:53:55 PM EDT	Incoming	I literally can't believe how big these
5				books are. I had to get this fucking
6	6/15/18	05:55:14 PM EDT	Incoming	thumb drive out of a hole lol.
7	6/15/18	05:57:54 PM EDT	Outgoing	Do u want all order books to find the big
8				orders?
9	6/15/18	05:57:54 PM EDT	Outgoing	Yeah just zip them up since there is a
10				bunch. I figure most people use same
11	6/15/18	06:01:47 PM EDT	Incoming	usernames.
12				You got to do a count if * for the first
13	6/15/18	06:04:35 PM EDT	Incoming	row to get the number of unique orders
14				should be more like 1k ish
15	6/15/18	06:14:53 PM EDT	Incoming	Gotcha, I was confused for a second.
16				I'm zipping all the big orderbooks into a
17	6/15/18	06:27:29 PM EDT	Incoming	file. I'm hunting them down now.
18				We had a lot of single sheet orders lol
19	6/15/18	07:23:39 PM EDT	Outgoing	Sending 11 books
20				Did u get it
21	6/15/18	07:24:16 PM EDT	Incoming	Yeah you only sent 8 books
22				I know the other 3 were tracking and I
23				realized as I was loading them. Sry

24	6/15/18	07:29:36 PM EDT	Incoming	There are some good customers in there.
25				When we chat we will get a good plan
26	6/15/18	07:33:42 PM EDT	Outgoing	for tackling all of this. We are gonna
27				make a lot of dough.
28				Yeah I'm making a list of buyers

29	6/17/18	04:54:35 PM EDT	Incoming	I am hard in anticipation for shipping
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1 37. Consistent with these communications, on June 15, 2018, CS1 received an
2 email, with the subject line "BOOKS FOR DADDY," which law enforcement
3 downloaded and was found to contain eight Microsoft Excel files, including files "L
4 METH 4.18.xlsx" and "L METH 4.20.xlsx." Those same Microsoft Excel files were
5 contained on an encrypted thumb drive that law enforcement seized from CS1 during the
6 execution of a federal search warrant. Those files contain mailing addresses and quantity
7 for LSD shipments (i.e., number of "sheets") to customers throughout the United States.

8 38. Additionally, on June 15, 2018, CS1 and HASKINS communicated
9 verbally, with CS1 using CS1's cellular telephone, and HASKINS using—according to
10 him—an online tool on his computer. During the conversation, which law enforcement
11 recorded, CS1 and HASKINS discussed that HASKINS was preparing packaging to ship
12 the LSD and when the LSD from "Trust" would arrive. HASKINS told CS1 that he
13 drives a 1996 Camry. During the conversation, law enforcement traveled to HASKINS'
14 residence at 3411 Bridgeport Way, Apartment 9, and observed the 1996 Camry,
15 registered to HASKINS, parked at the address. During the conversation, HASKINS also
16 told CS1 that he "paid a guy to pay a guy" to open P.O. Box 12000, in Olympia,
17 Washington, and that he lived approximately 45 minutes away from the P.O. Box.

18 39. Based on my training, experience and participation in this investigation, as
19 well as communications with CS1, the June 15, 2018, communications between CS1 and
20 HASKINS concern their prior dealings distributing LSD and MDMA, digital records of
21 that LSD distribution that HASKINS maintains on electronic devices in his residence,
22 including a computer and USB thumb drive, shipping materials that HASKINS has
23 collected that he intends to use to distribute LSD from his residence, and developing a list
24 of customers to whom the LSD from "Trust" can be marketed and sold.

25 **DRUG TRAFFICKING**

26 40. Based on my training, experience and participation in other drug
27 investigations, I know that:
28

1 a. Individuals involved in the unlawful distribution of illegal drugs
2 (“drug traffickers”) often maintain books, records, receipts, notes, ledgers, airline tickets,
3 money orders, and other papers relating to the acquisition, importation, transportation,
4 possession, sale and/or distribution of controlled substances, such as LSD, MDMA, and
5 anabolic steroids;

6 b. These books, records, receipts, notes, ledgers, etc., are often
7 maintained among the drug traffickers’ personal property in traditional paper form, or
8 stored electronically on computers or other electronic storage devices;

9 c. It is common for drug traffickers to secrete contraband and drug
10 paraphernalia, proceeds of drug sales, and records of drug transactions in secure locations
11 within their personal property for ready access and to conceal them from law
12 enforcement authorities;

13 d. Drug traffickers attempt to legitimize their profits from the sale of
14 drugs. To accomplish this goal, drug traffickers utilize, among other methods: 1) banks,
15 foreign and domestic, and their attendant services; 2) securities; 3) cashier’s checks; 4)
16 money drafts; 5) letters of credit; 6) real estate; and 7) businesses real and fictitious;

17 e. Depending on the scale of their drug distribution business, persons
18 involved in drug trafficking may conceal in their personal property caches of drugs, large
19 amounts of currency, financial instruments, precious metals, jewelry, and other items of
20 value that are the proceeds of drug transactions and evidence of financial transactions,
21 relating to obtaining, transferring, secreting, or spending of large sums of money made
22 from engaging in drug trafficking activities;

23 f. Drug traffickers often keep on hand large amounts of U.S. currency
24 to maintain and finance their drug trafficking business;

25 g. Drug traffickers frequently take or cause to be taken photographs
26 and videotapes of themselves, their associates, their property, and their illegal product
27 and that they usually maintain these photographs and video tapes in their possession;
28

1 h. The courts have recognized that unexplained wealth can be probative
2 evidence of crimes motivated by greed; that drug trafficking is a crime for which
3 monetary gain is generally the motive;

4 i. Financial records of the suspects of this investigation will likely
5 provide evidence of drug trafficking by revealing unexplained wealth and large cash
6 transactions, as well as providing confirmation of methods of payment and the source of
7 illegally imported controlled substances;

8 j. Drug traffickers commonly use and possess cellular telephones,
9 which often contain saved numbers of incoming and outgoing numbers called, electronic
10 calendars, appointment lists, and a personal phone directory with phone numbers and
11 other information related to their drug trafficking activities.

12 **REQUEST TO SEAL**

13 41. It is requested that this affidavit and the requested search warrant be filed
14 under seal, as they reveal an ongoing investigation, and in order to avoid premature
15 disclosure of the investigation, guard against fugitives, and better ensure the safety of
16 agents and others, except that working copies should be made available to the United
17 States Attorney's Office, HSI, and any other law enforcement agency designated by the
18 United States Attorney's Office.


19 **NO-KNOCK WARRANT REQUESTED**

20 42. In light of the nature of the investigation, I am requesting permission for
21 law enforcement to enter the SUBJECT PREMISES without first knocking and
22 announcing their presence. Based upon my knowledge, training, and experience, I know
23 that the drug evidence can be easily disposed of by, among other methods, flushing the
24 contraband down a toilet. The success of this search of the SUBJECT PREMISES is
25 dependent upon entry into the premises without providing the occupant with the time
26 necessary to destroy drugs. Under these circumstances, I respectfully submit that there is
27 a reasonable cause that knocking and announcing our presence upon the execution of the
28 warrant will inhibit an effective investigation by allowing the occupant(s) of the

1 SUBJECT PREMISES an opportunity to destroy evidence. I therefore respectfully
2 request that the Court authorize the search agents to dispense with the requirement to
3 knock and announce their presence when executing the warrant.

4 **CONCLUSION**

5 43. Based on information in this affidavit, I submit there is probable cause to
6 believe that a search of HASKINS, SUBJECT PREMISES, SUBJECT VEHICLE, and
7 the PO BOX will reveal evidence, contraband, fruits, and instrumentalities of violations
8 of 18 U.S.C. § 1956 (money laundering), 21 U.S.C. § 841(a) (1) (distribution of
9 controlled substances), 21 U.S.C. § 843 (use of a communication facility in furtherance
10 of drug trafficking) and 21 U.S.C. § 846 (conspiracy).

11
12 
13 JUSTIN JONES
14 Special Agent, HSI

15 The above-named agent provided a sworn statement attesting to the truth of the
16 contents of the foregoing affidavit on the 5th day of July, 2018.

17
18 
19 HON. THERESA L. FRICKE
20 U.S. Magistrate Judge
21
22
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28

ATTACHMENT A**Person and Places to be Searched**

- a. The person of Austin Michael HASKINS (DOB: XX/XX/1994) (photograph below).



- b. 3411 Bridgeport Way W., Apartment 9, University Place, Washington, as well as any common areas in or associated with the structure containing Apartment 9 (hallways, lobby, foyers, yard, patio, parking), and any storage units, lockers, closets, garages, or other locations on the property assigned to Apartment 9. The building containing Apartment 9 is a two story structure which is green with white trim. The numbers 3411, in white, are visible from Bridgeport Way W. Apartment 9 has a red in color door, with the number 9, in black, located above the door. The door to Apartment 9 faces west towards Bridgeport Way W. (the "SUBJECT PREMISES") (photographs below).



- c. A green-grey 1996 Toyota Camry (VIN 4T1BG12K4TU78480) with Washington State license plate BCM3156 (photograph below).



- d. P.O. Box 12000, Olympia, WA 98508-1200.

ATTACHMENT B**List of Items to be Seized and Searched**

All records, evidence, instrumentalities, or fruits relating to violations of 18 U.S.C. § 1956, 21 U.S.C. §§ 841(a)(1), 843, and/or 846, including, but not limited to, the following:

1. Controlled substances including LSD, MDMA a/k/a ecstasy, anabolic steroids, and paraphernalia and drug trafficking-related items such as scales, baggies, pill capsules, and any item that may be used in the packaging of ecstasy or another controlled substance for distribution.

2. Cash or currency or monetary instruments, including U.S. currency or other currency.

3. Firearms and other weapons found to be illegally possessed.

4. Books and papers reflecting the names, addresses, telephone numbers and other contacts or identification data relating to the possession, sale and distribution of controlled substances, including ecstasy.

5. Books, records, receipts, notes, ledgers, invoices and other papers relating to the source of proceeds deposited to personal and/or corporate bank accounts.

6. Records relating to deposits to personal and/or corporate bank accounts and expenditures of money and wealth, to wit: money orders, wire transfers, cashier checks and receipts, bank statements, passbooks, checkbooks and check registers.

7. Records related to the purchase of personal assets including, but not limited, real estate, vehicles, jewelry and boats.

8. Documents relating to the storage of items, records or documents at any location other than the SUBJECT PREMISES, including but not limited to contracts and lease agreements for storage units or safe deposit boxes.

9. Documents and records regarding the ownership, leasing and/or possession of the SUBJECT PREMISES.

1 10. Counter surveillance items such as cameras, closed-circuit televisions,
2 scanners, radios and other recording devices.

3 11. Property that would aid in the identification of the person or persons
4 responsible for committing the crimes under investigation.

5 **Computers and Electronic Media**

6 12. The authorization includes the search and seizure of computers and
7 electronic data including deleted data, remnant data and slack space, to include:

8 a. Computer hardware, meaning any and all computer equipment,
9 including any electronic devices that are capable of collecting, analyzing, creating,
10 displaying, converting, storing, concealing, or transmitting electronic, magnetic, optical,
11 or similar computer impulses or data. Included within the definition of computer
12 hardware is any data processing hardware (such as central processing units and self-
13 contained laptop or notebook computers); internal and peripheral storage devices (such as
14 fixed disks, external hard disks, floppy disk drives and diskettes, tape drives and tapes,
15 optical and compact disk storage devices, and other memory storage devices); peripheral
16 input/output devices (such as keyboards, printers, scanners, plotters, video display
17 monitors, and optical readers); related communications devices (such as modems, cables
18 and connections, recording equipment, RAM and ROM units, acoustic couplers,
19 automatic dialers, speed dialers, programmable telephone dialing or signaling devices,
20 and electronic tone generating devices); and any devices, mechanisms, or parts that can
21 be used to restrict access to such hardware (such as physical keys and locks).

22 b. Computer software, meaning any and all data, information,
23 instructions, programs, or program codes, stored in the form of electronic, magnetic,
24 optical, or other media, which is capable of being interpreted by a computer or its related
25 components. Computer software may also include data, data fragments, or control
26 characters integral to the operation of computer software, such as operating systems
27 software, applications software, utility programs, compilers, interpreters, communications
28

1 software, and other programming used or intended to be used to communicate with
2 computer components.

3 c. Computer-related documentation, meaning any written, recorded,
4 printed, or electronically stored material that explains or illustrates the configuration or
5 use of any seized computer hardware, software, or related items.

6 d. Computer passwords and data security devices, meaning any
7 devices, programs, or data whether themselves in the nature of hardware or software that
8 can be used or are designed to be used to restrict access to, or to facilitate concealment of,
9 any computer hardware, computer software, computer-related documentation, or
10 electronic data records. Such items include, but are not limited to, data security hardware
11 (such as encryption devices, chips, and circuit boards); passwords; data security software
12 or information (such as test keys and encryption codes); and similar information that is
13 required to access computer programs or data or to otherwise render programs or data
14 into usable form.